

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

Inventors/Applicants:

Ashutosh Joshi, Yuri Kolodny, Itay Kreisel, Yoel Sasson

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Art Unit: 1795

Examiner: Edna Wong

For: ENHANCED GENERATION OF HYDROXYL RADICALS

Attorney Docket: 0-05-106

Attorney: Roach Brown McCarthy & Gruber  
1920 Liberty Building  
Buffalo, NY 14202

Commissioner for Patents

P.O. Box 1450

Alexandria, VA 22313-1450

Sir:

**DECLARATION UNDER 37 C.F.R. § 1.1 32**  
**OF PROF. DAN MEYERSTEIN**

I hereby declare as follows:

1. I am a physical-inorganic chemist and an emeritus full professor at Ben-Gurion University of the Negev, Beer Sheva. I have over 41 years of scientific experience, particularly in the field of radical chemistry and Fenton reactions. I have published over 270 scientific papers in the peer reviewed journals.

2. I have reviewed the Office Actions of 4 May and 5 May, 2009 in this case. I understand that the Examiner cites CS 274995 (CS/995) in combination with US 6,793,903 (Parrish) and Jen et al. ("Determination of Hydroxyl Radicals in an Advanced Oxidation Process with Salicylic Acid Trapping and Liquid Chromatography", J. Chromatography A, Vol. 796 (1998) pp. 283-8) as rendering the technology of the present patent application obvious. The Examiner compares the processes described in CS/995 and in Parrish, mentioning similarities including the presence of UV light, assuming that in the thermal process of Parrish the UV light is present as it is present in the sun light. The Examiner also considers replacing transition metals in the published techniques by magnesium.
3. I have carefully examined the subject patent application, including the whole specification, as well as both patent documents and the article which were combined by the Examiner in her Office Action, and I have compared the techniques disclosed in the cited documents with the technology of the present application. I have the following observations.
4. Parrish describes the heterogeneously catalyzed thermal decomposition of hydrogen peroxide at temperatures from 200°C to 500°C. At these temperatures the black body radiation is far in the infra red region and somewhat in the visible region. The intensity of light at wavelength below 400 nm, i.e. in the UV region, is negligible and clearly cannot affect the observed process. This results from the Planck Law, which states how much light is radiated by the black body at the temperature T and at the wavelength  $\lambda$  (E being energy per time unit, per surface unit, per wavelength unit,  $c_1$  and  $c_2$  being Planck's radiation constants):

$$E = \frac{c_1}{\lambda^5 \cdot e^{\frac{c_2}{\lambda T}} - 1}$$

When integrating the energy firstly over the UV range ( $\lambda$  lower than 400 nm), and secondly over all wavelengths, the ratio of UV light in the energy spectrum will be about 10% UV for the temperature 5800°C (which is the surface temperature of the Sun). In contrast, the same integrations for the temperature 500°C will yield an imperceptible content of the UV light – by many orders lower than 10%.

The maximum wavelength ( $\lambda_{\max}$ ) in the spectrum moves toward higher values (less energy), as the temperature decreases from 5800°C to 500°C, according to the Wien Displacement Law, which can be written approximately as follows (wavelength being in  $\mu\text{m}$ ):

$$\lambda_{\max} = \frac{3000}{T}$$

When substituting the two temperatures in degrees Kelvin (6073°K and 773°K) into the formula,  $\lambda_{\max}$  values of about 0.5  $\mu\text{m}$  and 4  $\mu\text{m}$  are produced, the former of which corresponds to the yellow light from the Sun, and the latter to the infrared radiation of a body heated to 500°C. Moreover, the total radiation power of a body decreases with the forth power of the temperature, according to the Steffan-Boltzmann Law, providing about 3800 times less radiation energy (including eventual UV component) for 500°C than for 5800°C [  $(6073/773)^4 = 3809$ ; for 200°C it would be as high as 27174].

For the above reasons, I would not suspect the participation of UV light in the decomposition of hydrogen peroxide at temperatures from 200°C to 500°C as described in Parrish.

5. In regard to the considered replacement of transition metals with magnesium, I must note that magnesium has a different electronic structure than transition metals, and therefore it is not a catalyst for redox processes, in contrast to , e.g., iron, nickel, and copper. Thus, no inorganic

chemist will assume that magnesium oxide can replace a transition metal oxide in a catalytic process, particularly not in a Fenton type reaction.

6. It should be pointed out that there is no direct relation between the heterogeneously catalyzed thermal decomposition of hydrogen peroxide at temperatures from 200°C to 500°C on solid magnesium oxide (US 6,793,903) and the photochemical decomposition of hydrogen peroxide in the presence of transition metal complexes at ambient temperature (CS 274995). Moreover, I cannot see any direct relation between the processes of the mentioned patent documents and the process of the present invention. I would not have been – and I would not have expected another expert to be – inspired to design the present process after reading the cited two patents and the article. The finding of the present application in regard to the enhancing effects of magnesium oxide on the radical concentration during the photo-decomposition of hydrogen peroxide is new and unexpected.
7. The present technology provides, according to my understanding, a new process, and I believe that the use of magnesium oxide would not have been obvious. Even as an expert, I was quite surprised by the observed effect of suspended magnesium oxide on the radical formation.

I hereby declare that all statements made herein of my own knowledge are true and that all statements made herein on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under section 1001 of Title 18 of the United States Code, and that such willful false statements may jeopardize the validity of the subject application or any patent issuing thereon.

Dated: 30.09.09 Dan Meyerstein 

## DAN MEYERSTEIN

President of the Ariel University Center of Samaria.  
Irene Evens Professor of Inorganic Chemistry, Ben- Gurion University.

### Curriculum Vitae

Born: Jerusalem, Israel, 1938, Married to Prof. Naomi Meyerstein, 4 children.  
1956-61 The Hebrew University of Jerusalem.  
1961 M.Sc. in Physical Chemistry (adviser Prof A. Training).  
1961-65 Soreq Nuclear Research Center.  
1963-65 Ph.D. studies at the Hebrew University of Jerusalem (adviser Prof. M. Anbar).  
1965 Ph.D. in Chemistry.  
1965-6 Research Fellow Argonne National Laboratory, Argonne, IL., USA.  
1968- Chemistry Dept. Ben-Gurion University of the Negev,  
(1968-83 joint appointment with the Nuclear Research Centre Negev).  
1968-73 Senior Lecturer.  
1973-78 Associate Professor.  
1978- Professor.  
1970-71 Coordinator Physical Chemistry Dept. Ben Gurion University of the Negev.  
1971(summer) N.S.F. Research Fellow at Case Western Reserve University Cleveland, Ohio, USA.  
1971-74 Consultant Chemistry Division Argonne National Laboratory, Argonne, IL, USA.  
1973-77 Director Chemistry Dept. Nuclear Research Centre Negev.  
1976(summer) Visiting Scientist Hahn-Meitner Institute fur Kernforschung, Berlin, F.R.G.  
1977-78 Visiting Scientist Argonne National Laboratory, Argonne, IL, USA.  
1979-89 Library Director, Ben Gurion University of the Negev.  
1979(summer) Visiting Scientist Argonne National Laboratory, Argonne, IL, USA.  
1981(summer) Visiting Scientist Argonne National Laboratory, Argonne, IL, USA.  
1983(summer) Visiting Scientist Argonne National Laboratory, Argonne, IL, USA.  
1983-95 Full time employment at Ben-Gurion University of the Negev.  
1983- Consultant Nuclear Research Centre Negev  
1985(summer) Visiting Scientist Brookhaven National Laboratory, NY, USA.  
1985- 6 Consultant Netafim, Kibutz Hazerim.  
1986-91 Chairman Coal Research Center.  
1987(summer) Visiting Scientist Hiroshima University, Japan.  
1988-91 President, Israel Chemical Society.  
1990-4 Deputy Rector, Ben-Gurion University of the Negev.  
1993 Acting President, Israel Chemical Society.  
1995- President, Ariel University Center of Samaria  
1997-8 Consultant Makhteshim Ltd.  
1998-2000 Chairman, Israel Society for Oxygen and Free Radical Research.  
2000-2002 Secretary Division Inorganic Chemistry, IUPAC  
2004- Professor Emeritus, Ben-Gurion University of the Negev.  
Member: Israel Chemical Society, Israel Society for Oxygen and Free Radical Research.  
American Chemical Society, the Royal Society of Chemistry and the Society for Biological Inorganic Chemistry.

Languages: Hebrew and English fluent, German good (speaking and reading only).

### Honors.

1997 Meitner-Humboldt Research Prize  
1998 Kolthoff prize

### List of Publications

- 1) D. Meyerstein and A. Treinin  
Absorption Spectra of  $\text{NO}_3^-$  in Solution.  
Trans. Faraday Soc., 57, 2104 (1961).
- 2) D. Meyerstein and A. Treinin  
Relation between Lyotropic and Spectroscopic Properties of Anions in Solution.  
J. Phys. Chem., 66, 446 (1962).
- 3) D. Meyerstein and A. Treinin  
Charge-Transfer Complexes of Iodine and Inorganic Anions in Solution.  
Trans. Faraday Soc., 59, 1114 (1963).
- 4) M. Anbar and D. Meyerstein  
The Oxidation of Fluoride Ions upon Radiolysis in Dilute Aqueous Solutions.  
Israel J. Chem. Proc.1, 254 (1963)  
and Israel Atomic Energy Commission Report IA-851(1965).
- 5) M. Anbar and D. Meyerstein  
The Interaction of Radiolytically Produced Univalent Transition-Metal Ions with Water.  
Proc. Chem. Soc., 23 (1964).
- 6) M. Anbar and D. Meyerstein  
The Effect of Transition-Metal Ions on the Yield of "ResidualHydrogen" in Neutral Radiolyzed Solution.  
J. Phys. Chem., 68, 1713 (1964).
- 7) M. Anbar and D. Meyerstein  
Isotope Effect in the Hydrogen Abstraction from aliphatic Compounds by Radiolytically Produced Hydrogen Atoms in Aqueous Solutions.  
J. Phys. Chem., 68, 3184 (1964).
- 8) M. Anbar, D. Meyerstein and P. Neta  
On the Radiolysis of Alkali Halides in Aqueous Solutions Saturatedwith Nitrous-Oxide.  
J. Phys. Chem., 68, 2967 (1964).
- 9) M. Anbar and D. Meyerstein  
Isotope Effect in the Radiolysis and Photolysis of  $\text{H}_2\text{O}$ - $\text{D}_2\text{O}$  Mixtures.  
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- 10) M. Anbar and D. Meyerstein  
Effect of Linear Energy Transfer (L.E.T.) on the H/D Isotope Effect in the Formation of Hydrogen from Irradiated Water.  
Trans. Faraday Soc., 61, 263 (1965).
- 11) M. Anbar and D. Meyerstein  
Effect of Ligands on the Rate of Reduction of Cobalt(III) Complexes by Radiolytically Produced Hydrogen Atoms.  
Nature 206, 818 (1965).
- 12) M. Anbar and D. Meyerstein  
The Isotope Effect in Hydrogen Formation by the Reaction between Two Aquated Electrons.  
Chem. Comm. 57 (1966).
- 13) M. Anbar, D. Meyerstein and P. Neta

- Reactivity of Aromatic Compounds Towards Hydrogen Atoms.  
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- 14) M. Anbar, D. Meyerstein and P. Neta  
Reactivity of Aliphatic Compounds towards Bromine and Hydrogen Atoms  
in Aqueous Solutions.  
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  - 15) M. Anbar and D. Meyerstein  
The Synthesis of O<sup>18</sup> Labelled Hydrogen-Peroxide in H<sub>2</sub>O<sup>16</sup>.  
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  - 16) M. Anbar, D. Meyerstein and P. Neta  
The Reactivity of Aromatic Compounds toward Hydroxyl Radicals.  
J. Phys. Chem., 70, 2660 (1966).
  - 17) M. Anbar, D. Meyerstein and P. Neta  
The Reactivity of Aliphatic Compounds toward Hydroxyl Radicals.  
J. Chem. Soc. B. 742 (1966).
  - 18) M. Anbar and D. Meyerstein  
H/D Isotope Effects in the Formation of Hydrogen from the Combination of  
two Radicals in Aqueous Solutions.  
Trans. Faraday Soc., 62, 2121 (1966).
  - 19) D. Meyerstein and W. A. Mulac  
Reductions by Monovalent Zinc, Cadmium and Nickel Ions.  
J. Phys. Chem., 72, 784 (1968).
  - 20) J. Rabani and D. Meyerstein  
The Competition H+H and H+Ferricyanide: The Absolute Rate Constants.  
J. Phys. Chem., 72, 1599 (1968).
  - 21) D. Meyerstein and W. A. Mulac  
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Ions in Aqueous Solutions.  
J. Phys. Chem., 73, 1091 (1969).
  - 22) M. Anbar and D. Meyerstein  
The effect of Ligands on the Reactivity of Metal Cations towards the Acid.  
Trans. Faraday Soc., 65, 1812 (1969).
  - 23) D. Meyerstein and W. A. Mulac  
The effect of Ligands on the Reactivity of Metal Cations towards the  
Hydrated Electron. Part II. The Effect of Glycine, Ethylenediamine and  
Nitrilotriacetic Acid.  
Trans. Faraday Soc., 65, 1818 (1969)
  - 24) I. Fried and D. Meyerstein  
Electrocatalytic Oxidations of Amines on Platinum Electrodes. Part I.  
Oxidation via Copper Complexes.  
J. Electroanal. Chem. and Interfacial Electrochem., 23, App. 6 (1969)
  - 25) A. Levy, D. Meyerstein and M. Ottolenghi  
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Transfer Complex.  
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Ions.

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- 27) I. Fried and D. Meyerstein  
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  - 28) I. Fried and D. Meyerstein  
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Oxidation of Ethylenediamine via Higher Oxidation  
States of Nickel.  
Israel J. Chem. 8, 865 (1970).
  - 29) G. Navon and D. Meyerstein  
The Reduction of Ruthenium(III) Hexaamine by Hydrogen Atoms and  
Monovalent Zinc, Cadmium and Nickel Ions in Aqueous Solutions.  
J. Phys. Chem., 74, 4067 (1970).
  - 30) D. Meyerstein  
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of the Aquo Complex.  
Inorg. Chem., 10, 638 (1971).
  - 31) D. Meyerstein  
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Properties of the Amino Complexes.  
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  - 32) H. Cohen and D. Meyerstein  
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J. Amer. Chem. Soc., 93, 4179 (1971).
  - 33) A. Levy, D. Meyerstein and M. Ottolenghi  
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Iodobenzene.  
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  - 34) J. Lati and D. Meyerstein  
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Inorg. Chem., 11, 2393 (1972)
  - 35) J. Lati and D. Meyerstein  
Trivalent Nickel. Part II. A Pulse Radiolytic Study of the Formation and  
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Aqueous Solution.  
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glyoxime Complex.  
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  - 37) H. Cohen and D. Meyerstein  
On the Mechanism of Formation of Chromium-Carbon Bonds in Aqueous  
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- On the Mechanism of Reduction of Co(III) and Ru(III) Hexamine Complexes by Several Aliphatic Radicals.  
J. Amer. Chem. Soc., 94, 6944 (1972)
- 39) G. Navon, R. Paniel and D. Meyerstein  
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On the Mechanism of Reduction of Porphyrins. A Pulse Radiolytic Study.  
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- 44) H. Cohen and D. Meyerstein  
Chromium-Carbon Bonds in Aqueous Solutions. A Pulse Radiolytic Study.  
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- 45) M. Freiberg, S. Weiss and D. Meyerstein  
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On the Spectrum, Kinetics of Formation and Decomposition of Penta-Aquo-Chromium(III) Hydride and Aquo-Chromium(I) in Aqueous Solutions. A Pulse Radiolytic Study.  
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On the Kinetics of Complexation of Cuprous with Maleate and Fumarate in Aqueous Solutions. A Pulse Radiolytic Study.  
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- 49) J. Lati and D. Meyerstein  
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- 50) H. Cohen and D. Meyerstein  
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- 52) H. Cohen and D. Meyerstein

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- 55) D. Meyerstein

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- 56) D. Meyerstein

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- 61) H. Elroi and D. Meyerstein

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- Concentration Effects on Quenching of  $\text{Ru}(\text{bpy})_3^{2+}$  Emission in Polyelectrolyte Solutions.  
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- 65) K. Wieghardt, H. Cohen and D. Meyerstein  
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Angewandte Chemie, 17, 608 (1978).
- 66) D. A. Ryan, D. Meyerstein, W. A. Mulac and J. H. Espenson  
Electron Transfer between Cobalt(I) and Cobalt(III) in Vitamin  $\text{B}_{12}$ .  
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Inorg. Chem., 18, 971 (1979).
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Oxidation of a Nickel(II) Complex with an Unsaturated Macrocyclic Ligand in Aqueous Solution. A Pulse Radiolytic Study.  
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Electrochemical Preparation of Stable Ni(III) Complexes with Tetradentate Ligands in Aqueous Solutions.  
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Intermediates with Copper-Carbon Bonds Formed by the Reaction of Aliphatic Free Radicals with a Copper-Peptide Complex in Aqueous Solution.  
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J. Inorg. Nucl. Chem., 42, 219 (1980).
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